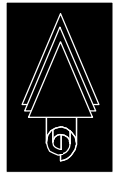


A F & P A



AMERICAN FOREST & PAPER ASSOCIATION
Regulatory Affairs

March 1, 1999

(Via Fax)

Elizabeth LaPlante
U.S. EPA, Great Lakes National Program Office
77 West Jackson Boulevard
G-17J
Chicago, Illinois, 60604.

Re: AF&PA Comments on Great Lakes Binational Toxics Strategy Octachlorostyrene (OCS) Report: A Review of Potential Sources (Report) 63 *Federal Register* 72,311 (December 31, 1998)

Dear Ms. LaPlante:

AF&PA appreciates this opportunity to provide comments on the A Great Lakes Binational Toxics Strategy Octachlorostyrene (OCS) Report: A Review of Potential Sources (Report) AF&PA participated extensively, both on its own, and as a member of the Council of Great Lakes Industries (CGLI), in the early development of the Great Lakes Binational Strategy (BNS). AF&PA supports CGLI's comments filed today on several BNS issues. Also, forest products industry representatives have actively participated in several of the substance-specific Workgroups, including the OCS Workgroup.

1 As an initial matter, we must express our disappointment with the manner in which the Report was developed. The OCS Workgroup had been making significant progress on identifying potential sources of OCS and developing a potential action plan. The release of the Report to the public before providing an opportunity for Workgroup review has significantly hampered that progress, and diverted Workgroup members' attention from that progress. We strongly suggest that future reports be provided to Workgroup members for initial review before distribution to the public. Had that review occurred with the Report, many of its inaccuracies and incorrect assumptions could have been resolved before wider, public distribution.

2 In comments submitted under separate cover by the Council of Great Lakes Industries (CGLI), information is provided which is highly suggestive that the levels of OCS in the ambient environment are continuing to decrease. These trends do not support the existence of significant (if any) ongoing or unidentified sources of OCS. Given that the data do not support evidence of significant ongoing sources, speculation about potential new sources is not warranted and does

not serve the purposes of the Binational Toxics Strategy. A more critical examination would be far more appropriate to assure that resources are directed only where needed. We suggest that EPA subject the Report to a thorough peer review process to determine whether some of its underlying assumptions withstand such a critical scientific review. Such a review would help ensure that both public and private resources are directed only where needed.

3 In the attached comments, which is confined to a review of some of the chemistry information supporting the identification of potential OCS sources in the Report, NCASI has conducted a critical examination of the most probable reaction mechanism and reaction conditions for known sources of octachlorostyrene vs. other potential sources. That examination clearly indicates there is no technically defensible justification for hypothesizing OCS formation in several manufacturing processes discussed in the Report, including the processes associated with the forest products industry. Finally, there are fundamental flaws in the underlying technical assumption used in the proposed approach to use known sources or inventories of hexachlorobenzene or PCDD/F to predict or develop an OCS inventory.

Again, thank you for this opportunity to comment on the Report. We request that the final version of the Report reflect the information we are providing today. If you have any questions about this material, please feel free to call me at (202) 463-2581. If your questions are of a technical nature, please contact Larry LaFleur, NCASI, at (541) 752-8801. Thank you for your attention to this matter.

Sincerely,

Jerry Schwartz
Director
Water Quality Programs

Attachment

cc: Frank Anscombe, EPA